

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO FRIENDS OF THE
EARTH

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

TO: COUNSEL FOR FRIENDS OF THE EARTH

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the Friends of the Earth answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The Friends of the Earth's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the Friends of the Earth, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.
2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **“Combined Regulatory Proceedings.”** The term “Combined Regulatory Proceedings” is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the “Commission”) and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth’s and Sierra Club’s filing of their “Complaint of Friends of the Earth and Sierra Club”; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS’s filing of its “Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920”; and (c) Docket No. 2017-370-E, which was initiated by SCE&G’s and Dominion Energy, Inc.’s filing of their “Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.”

2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to the Friends of the Earth, the party to which these Requests are directed, as well as its President (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the Friends of the Earth.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:**Responsible Person:**

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



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Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO FRIENDS OF THE EARTH via electronic mail and U.S. Mail, postage prepaid, upon the following:

Robert Guild Attorney at Law
314 Pall Mall Street
Columbia, SC 29201


Belton T. Zeigler

August 24, 2018

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THE PUBLIC SERVICE COMMISSION OF
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cost recovery plan.

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INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO CITY OF
ORANGEBURG

TO: COUNSEL FOR CITY OF ORANGEBURG

South Carolina Electric & Gas Company (“SCE&G”) by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that City of Orangeburg answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

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6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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9. **“You” and “Your.”** The words “you” and “your” refer to City of Orangeburg, the party to which these Requests are directed, as well as its county manager (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on the City of Orangeburg’s behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:**Responsible Person:**

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



Belton T. Zeigler
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Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018


CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO CITY OF ORANGEBURG via electronic mail and U.S.

Mail, postage prepaid, upon the following:

James F. Walsh, Jr.
City of Orangeburg
1436 Amelia Street
Orangeburg, SC 29116

James N. Horwood, Stephen Pearson
Jessica R. Bell, Peter J. Hopkins
Spiegel & McDiarmid
1875 Eye Street
NW Suite 700
Washington, DC 20006



Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
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SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO THE ELECTRIC
COOPERATIVES OF SOUTH
CAROLINA, INC.

TO: COUNSEL FOR ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC.

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Electric Cooperatives of South Carolina, Inc. answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

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2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to Electric Cooperatives of South Carolina, Inc. the party to which these Requests are directed, as well as its president and CEO (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the Electric Cooperatives of South Carolina, Inc.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:**Interrogatory 1-3**

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:**Request for Production 1-3**

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



Belton T. Zeigler
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(803) 454-7720
belton.zeigler@wbd-us.com

K. Chad Burgess, Esquire
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Mail Code C222
220 Operation Way
Cayce, SC 29033-3701
Telephone: 803-217-8141
Facsimile: 803-217-7931
chad.burgess@scanna.com
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Mitchell Willoughby
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Post Office Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC. via electronic mail and U.S. Mail, postage prepaid, upon the following:

Christopher R. Koon
The Electric Cooperatives of South Carolina
800 Knox Abbott Drive
Cayce, SC 29033-3311

Christopher S. McDonald
The Tiencken Law Firm, LLC
234 Seven Farms Drive, Suite 113
Daniel Island, SC 29492

Frank Ellerbe III, John H. Tiencken, Jr.
Kevin K. Bell
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211


Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO AARP SOUTH
CAROLINA

TO: COUNSEL FOR AARP SOUTH CAROLINA

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that AARP South Carolina answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

AARP South Carolina's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to AARP South Carolina, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **“Combined Regulatory Proceedings.”** The term “Combined Regulatory Proceedings” is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the “Commission”) and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth’s and Sierra Club’s filing of their “Complaint of Friends of the Earth and Sierra Club”; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS’s filing of its “Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920”; and (c) Docket No. 2017-370-E, which was initiated by SCE&G’s and Dominion Energy, Inc.’s filing of their “Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.”

2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to AARP South Carolina, the party to which these Requests are directed, as well as its executive director (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on AARP South Carolina’s behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:**Responsible Person:**

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



Belton T. Zeigler
Womble Bond Dickinson (US) LLP
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Suite 1600
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K. Chad Burgess, Esquire
Matthew Gissendanner, Esquire
Mail Code C222
220 Operation Way
Cayce, SC 29033-3701
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Mitchell Willoughby
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas
Company


Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO AARP SOUTH CAROLINA via electronic mail and U.S. Mail, postage prepaid, upon the following:

Adam Protheroe, Susan Berkowitz
S.C. Appleseed Legal Justice Center
PO Box 7197
Columbia, SC 29202

John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119


Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for
Rate Relief to South Carolina Electric & Gas
Company's Rates Pursuant to S.C. Code Ann.
§ 58-27-920.

IN RE:

Joint Application and Petition of South
Carolina Electric & Gas Company and
Dominion Energy, Inc., for review and
approval of a proposed business combination
between SCANA Corporation and Dominion
Energy, Inc., as may be required, and for a
prudency determination regarding the
abandonment of the V.C. Summer Units 2 & 3
Project and associated customer benefits and
cost recovery plan.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO SOUTH CAROLINA
COASTAL CONSERVATION LEAGUE

TO: COUNSEL FOR SOUTH CAROLINA COASTAL CONSERVATION LEAGUE

South Carolina Electric & Gas Company (“SCE&G”) by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the South Carolina Coastal Conservation League answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The South Carolina Coastal Conservation League’s responses to SCE&G’s First Set of Interrogatories and First Requests for Production of Documents (collectively, the “Requests”) should include not only all information and documents available to the South Carolina Coastal Conservation League, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter

until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **“Combined Regulatory Proceedings.”** The term “Combined Regulatory Proceedings” is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the “Commission”) and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth’s and Sierra Club’s filing of their “Complaint of Friends of the Earth and Sierra Club”; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS’s filing of its “Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920”; and (c) Docket No. 2017-370-E, which was initiated by SCE&G’s and Dominion Energy, Inc.’s filing of their “Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.”

2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to the South Carolina Coastal Conservation League, the party to which these Requests are directed, as well as its executive director (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the South Carolina Coastal Conservation League.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:**Interrogatory 1-3**

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:**Request for Production 1-3**

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

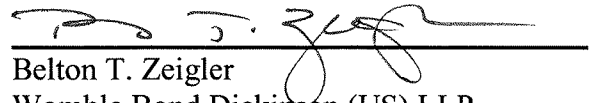
Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



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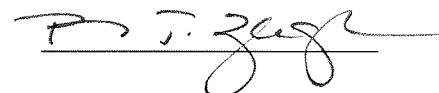
Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA COASTAL CONSERVATION LEAGUE via electronic mail and U.S. Mail, postage prepaid, upon the following:

William C. Cleveland IV, Elizabeth Jones
Southern Environmental Law Center
463 King St, Suite B
Charleston, SC 29403


Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for
Rate Relief to South Carolina Electric & Gas
Company's Rates Pursuant to S.C. Code Ann.
§ 58-27-920.

IN RE:

Joint Application and Petition of South
Carolina Electric & Gas Company and
Dominion Energy, Inc., for review and
approval of a proposed business combination
between SCANA Corporation and Dominion
Energy, Inc., as may be required, and for a
prudency determination regarding the
abandonment of the V.C. Summer Units 2 & 3
Project and associated customer benefits and
cost recovery plan.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO SOUTH CAROLINA
ATTORNEY GENERAL

TO: COUNSEL FOR SOUTH CAROLINA ATTORNEY GENERAL

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the South Carolina Attorney General answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The South Carolina Attorney General's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the South Carolina Attorney General, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **“Combined Regulatory Proceedings.”** The term “Combined Regulatory Proceedings” is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the “Commission”) and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth’s and Sierra Club’s filing of their “Complaint of Friends of the Earth and Sierra Club”; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS’s filing of its “Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920”; and (c) Docket No. 2017-370-E, which was initiated by SCE&G’s and Dominion Energy, Inc.’s filing of their “Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.”

2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to the South Carolina Attorney General (past and present), the party to which these Requests are directed, as well as its agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the South Carolina Attorney General.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:**Responsible Person:**

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:**Responsible Person:****Request for Production 1-4**

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:**Responsible Person:****Request for Production 1-5**

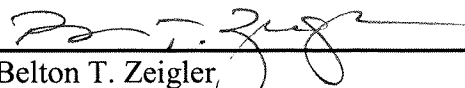
Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:**Responsible Person:****Request for Production 1-6**

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:**Responsible Person:**

Respectfully submitted,



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Mitchell Willoughby
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Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA ATTORNEY GENERAL via electronic mail and U.S. Mail, postage prepaid, upon the following:

Office of SC Attorney General
Emory Smith, Robert Cook
PO Box 11549
Columbia, SC 29211



Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for
Rate Relief to South Carolina Electric & Gas
Company's Rates Pursuant to S.C. Code Ann.
§ 58-27-920.

IN RE:

Joint Application and Petition of South
Carolina Electric & Gas Company and
Dominion Energy, Inc., for review and
approval of a proposed business combination
between SCANA Corporation and Dominion
Energy, Inc., as may be required, and for a
prudency determination regarding the
abandonment of the V.C. Summer Units 2 & 3
Project and associated customer benefits and
cost recovery plan.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO SOUTHERN
ALLIANCE FOR CLEAN ENERGY

TO: COUNSEL FOR SOUTHERN ALLIANCE FOR CLEAN ENERGY

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the Southern Alliance for Clean Energy answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The Southern Alliance for Clean Energy's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the Southern Alliance for Clean Energy, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

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5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

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3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **“Relate,” “Relating,” “Relating to,” and “Related to.”** The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **“You” and “Your.”** The words “you” and “your” refer to the Southern Alliance for Clean Energy, the party to which these Requests are directed, as well as its executive director (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the Southern Alliance for Clean Energy.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:**Interrogatory 1-3**

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

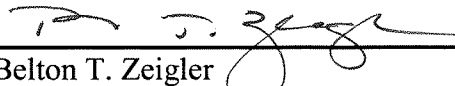
Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,


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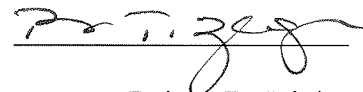
Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTHERN ALLIANCE FOR CLEAN ENERGY via electronic mail and U.S. Mail, postage prepaid, upon the following:

William C. Cleveland IV, Elizabeth Jones
Southern Environmental Law Center
463 King St, Suite B
Charleston, SC 29403


Belton T. Zeigler

August 24, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudence determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

SOUTH CAROLINA ELECTRIC AND
GAS COMPANY'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO SOUTHERN
CURRENT, LLC

TO: COUNSEL FOR SOUTHERN CURRENT, LLC

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Southern Current, LLC answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Southern Current, LLC's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Southern Current, LLC, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **“Combined Regulatory Proceedings.”** The term “Combined Regulatory Proceedings” is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the “Commission”) and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth’s and Sierra Club’s filing of their “Complaint of Friends of the Earth and Sierra Club”; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS’s filing of its “Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920”; and (c) Docket No. 2017-370-E, which was initiated by SCE&G’s and Dominion Energy, Inc.’s filing of their “Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.”

2. **“Communication.”** The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **“ORS.”** The term “ORS” is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **“People” and “Person.”** The words “people” and “person” shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. “Relate,” “Relating,” “Relating to,” and “Related to.” The terms “relate,” “relating,” “relating to,” and “related to” mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. “You” and “Your.” The words “you” and “your” refer to Southern Current, LLC, the party to which these Requests are directed, as well as its executive officers (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on Southern Current, LLC’s behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person’s: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:**Responsible Person:****Interrogatory 1-4**

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:**Responsible Person:****REQUESTS FOR PRODUCTION****Request for Production 1-1**

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:**Responsible Person:****Request for Production 1-2**

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:**Responsible Person:**

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,



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Attorneys for South Carolina Electric & Gas
Company

Cayce, South Carolina
August 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTHERN CURRENT, LLC. via electronic mail and U.S. Mail, postage prepaid, upon the following:

Richard L. Whitt
Austin & Rogers, PA
508 Hampton St., Ste. 300
Columbia, SC 29201


Belton T. Zeigler

August 24, 2018